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May 26, 2000

Mr. Mike Madigan, Chair
Ms. Sunne McPeak, Vice Chair
Bay Delta Advisory Council
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mike and Sunne,

I am writing on behalf of the Community Alliance with Family Farmers and in response to your excellent efforts to develop a group BDAC recommendation on the CalFed Preferred Program Alternative.

The work of CalFed is critically important in shaping a bright future for California. Responsible and sustainable stewardship of California's natural resources in the coming decades will require changes in behavior and attitude on the part of all of California's citizens. The open process of both CalFed and the Policy Group are an implicit recognition of this. CAFF appreciates the broad stakeholder involvement represented by BDAC's membership. The limited and often narrowly focussed perspectives of technical experts are not adequate to address CalFed's mandate. It is a huge step forward that the state and federal agencies have realized that it is not only the water purveyors who have a stake in these issues, but a broad spectrum of the public.

We would also like to applaud your leadership. Many of the members, and public stakeholders who have attended the meetings regularly to listen and participate, have also shown a deep commitment to CalFed's mission. It takes special qualities to bring stakeholders with differing views together. Those skills are in shorter supply than the skills of adversarial politics and courtroom showmanship. Let us hope that the ingrained habits of battle do not overcome the wisdom of continued negotiation.

In the March-April issue of *California Agriculture*, Henry Vaux Jr. wrote that, "the institutions which Californians have relied upon to manage their natural resources are not well or appropriately constituted to address many of the challenges [of environmental deterioration]. Fundamental changes will be needed in our land- and water-management institutions..." At CAFF we believe that

this is true of California's water management institutions and hope that the environmental restoration mandate of CalFed will set an example for water management in California in general.

The development of group comments by BDAC has provided an excellent opportunity for discussion. CAFF can only express conditional support, and appreciates the opportunity to express a few additional thoughts.

Through-Delta Optimization

CAFF agrees with the concept of optimizing through-Delta conveyance and with the notes on this subject in the BDAC group recommendations. We are concerned that incentives to ensure success and cooperation from all parties may not yet be great enough. This is why we have repeatedly advocated the idea of explicit linkages between various parts of the CalFed program. If, as our solution principles state, "improvements for some problems are not going to be made without corresponding improvements for other problems," then there must be incentives that reward responsible water management and possibly costs to those parties who are not yet on-board. (For example, no access to the CalFed water transfers market without higher than average level of adoption of BMP's, or no access to banked groundwater without reduction in district-wide pesticide run-off or sedimentation.)

Storage

CAFF would be much more comfortable with the recommendation to fast-track storage studies if there were explicit linkages between storage and other program elements, and if there was a greater level of trust and cooperation in play between various stakeholders. History makes it clear that plumbing is not the answer to our water management problems. Historically, politicians have advocated various plumbing solutions with promises, for example that new projects will address groundwater depletion. But without responsible growth management and political leadership, the promises are not kept. We fear that the current assurance that new storage will be managed for environmental benefits could travel the same path.

In our opinion, small-scale, local projects will always provide greater all-around flood control and water supply benefits than large-scale projects that please the engineers. Watershed protection as practiced by New York City in their Catskill/Delaware watersheds provides one good example of this principle. Many other demonstrations of the cost-effectiveness of watershed restoration in providing flood control and increased groundwater storage are available. We find it quite unfortunate that greater California leadership has not been developed to spearhead this water management approach.

Water Use Efficiency

The focus on cost effectiveness in water use efficiency is quite understandable, but not forward thinking. Water conservation issues are much more complex in agriculture than some stakeholders indicate, but for the state as a whole, CAFF strongly supports a significant investment in water use efficiency measures and public education regarding California's water challenges. We all have to take

these challenges to heart, and water use efficiency programs should make water conservation everyone's responsibility. Many of the stakeholder groups appear to be expecting "new" water and water reallocations to come their way from other users. While CalFed cannot engineer a change in these attitudes, the linkages that we have discussed elsewhere in this memo and an emphasis on conservation as a priority, would send the correct leadership message.

Avoid Adverse Community Impacts

Local communities have much expertise, insight and energy to offer to various CalFed projects. On the other hand, local communities also have much at stake, a long memory and the ability to impede progress. We feel that the language in the recommendation on this subject (page 3c) is extremely weak, reflecting a failure to fully grapple with the implications of this problem. The process for avoiding and addressing adverse or cumulative community impacts should be developed as soon as possible.

Public Involvement

We regret that CAFF has been unable to muster sufficient resources to participate more fully in the CalFed process over the last few years. We think it likely that there are a number of grassroots organizations in a similar situation. Engaging in these complex issues and contributing in a meaningful way requires resources. Yet it is critically important to Bay Delta restoration that all Californians feel empowered to contribute. We strongly recommend that CalFed continue to listen actively to a broad set of stakeholders, make investments in public education, and commit to a process of open decision-making.

Thank you very much for all of your hard work on these issues.

Sincerely,


Judith Redmond
CAFF